

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS  
Docket No.: 12591-PBS**

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CONVERSE, INC.,

Plaintiff,

v.

ALON INTERNATIONAL, S.A.,

Defendant.

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**DEFENDANT ALON INTERNATIONAL, S.A.'S  
UNOPPOSED MOTION TO ADMIT PAUL A. CAPUA *PRO HAC VICE***

Defendant Alon International, S.A. ("Alon"), pursuant to Local Rule 83.5.3(b), hereby submits this Motion to Admit Paul A. Capua *Pro Hac Vice* as counsel in the above styled matter. In support of its Motion, Alon submits the Certificate of Paul A. Capua, attached hereto as Exhibit "A" and Certificate of Good Standing from the Florida Bar, attached hereto as Exhibit "B." In further support of this Motion, Alon states as follows:

1. Mr. Capua is an associate with the law firm of Astigarraga Davis Mullins & Grossman, P.A., located at 701 Brickell Avenue, Miami FL 33131.
2. Mr. Capua is an attorney licensed to practice law in the State of Florida and has been a member in good standing of the Florida Bar since 1995.
3. Mr. Capua is also admitted to practice before the United States Courts of Appeals for the Eleventh Circuit and the District Court for the Southern District of Florida.
4. Mr. Capua certifies that he is a member in good standing in every jurisdiction where he has been admitted to practice. Mr. Capua certifies that no disciplinary proceedings are pending against him as member of the bar in any jurisdiction.

5. Mr. Capua further certifies that he is familiar with and shall be governed by the local rules of this Court.

6. Cynthia D. Vreeland, Esq. and Richard A. Johnston Esq. of the law firm of Wilmer Cutler Pickering Hale and Dorr, LLP, 60 State Street, Boston, Massachusetts 02109, are members of the Massachusetts Bar in good standing and are the Massachusetts lawyers whom will act as local counsel for Defendant Alon in this action.

7. On May 31, 2005, counsel for Alon communicated with counsel for Converse, and Converse does not object to the admittance of Mr. Capua *pro hac vice* in this matter.

WHEREFORE, Defendant Alon respectfully requests that Paul A. Capua. of the law firm of Astigarraga Davis Mullins & Grossman, P.A. be admitted to appear *pro hac vice* before this Honorable Court in this action.

Dated this \_\_\_\_ day of May 2005.

Respectfully submitted,

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**WILMER CUTLER PICKERING  
HALE AND DORR, LLP**

Richard A. Johnston, Cynthia D. Vreeland  
60 State Street  
Boston, Massachusetts 02109  
Telephone: (617) 526-6000  
Facsimile: (617) 526-5000

*Counsel for Defendant Alon International, S.A.*

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that the foregoing was sent electronically to **Michael C. Gilleran, Esq.**, Pepe & Hazard, LLP, 225 Franklin Street, 16<sup>th</sup> Floor, Boston, Massachusetts 02110-2804 on this \_\_\_\_ day of May, 2005.

\_\_\_\_\_  
Cynthia D. Vreeland

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# **EXHIBIT “A”**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

**Docket No.: 12591-PBS**

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**CONVERSE, INC.,**

**Plaintiff,**

**v.**

**ALON INTERNATIONAL, S.A.,**

**Defendant.**

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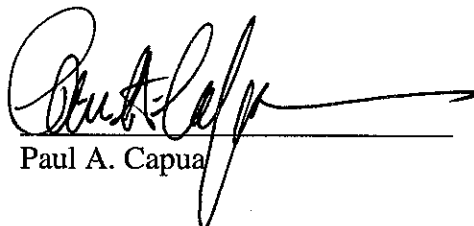
**CERTIFICATE OF PAUL A. CAPUA IN SUPPORT DEFENDANT  
ALON INTERNATIONAL, S.A.'S *UNOPPOSED* MOTION  
TO ADMIT PAUL A CAPUA *PRO HAC VICE***

I, Paul A. Capua certify that the following information is true and correct:

1. I am an associate of the law firm of Astigarraga Davis Mullins & Grossman, P.A., located at 701 Brickell Avenue, 16th Floor, Miami, Florida 33131.
2. I am a member in good standing of the Bar of the State of Florida, the United States District Court for the Southern District of Florida and the Court of Appeals for the Eleventh Circuit.
3. I have never been denied admission to, nor have I ever been disciplined in any court of any jurisdiction.
4. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts.
5. I respectfully request permission to appear before this Court *pro hac vice*

to represent the interests of Defendant Alon International, S.A. in this action.

**Under penalties of perjury pursuant to 28 U.S.C. § 1746 and section 92.525 of the Florida Statutes, I declare that I have read the foregoing and that the facts stated herein are true and correct.**



Paul A. Capua

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# **EXHIBIT “B”**



# The Florida Bar

JOHN F. HARKNESS, JR.  
EXECUTIVE DIRECTOR

651 EAST JEFFERSON STREET  
TALLAHASSEE, FLORIDA 32399-2300

850/561-5600  
WWW.FLABAR.ORG

State of Florida )

County of Leon )

In Re: 68500  
Paul Augustus Capua  
Astigarraga Davis  
701 Brickell Ave. Fl. 16  
Miami, Florida

C  
O  
P  
Y  
I HEREBY CERTIFY that I am the duly appointed custodian of membership records of The Florida Bar.

I FURTHER CERTIFY that the records in the office of the Clerk of the Supreme Court of Florida indicate that said attorney was admitted to practice law in the State of Florida on November 22, 1995.

I FURTHER CERTIFY that the records in the office of The Florida Bar indicate that the above attorney is a member of The Florida Bar in good standing.

Dated this 26 day of May, 2005.

Willie Mae Shepherd  
Supervisor, Membership Records  
The Florida Bar

WMS/mlH6:R10



**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

**Case No.: 04-12591-PBS**

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**CONVERSE, INC.,**

**Plaintiff,**

**v.**

**ALON INTERNATIONAL, S.A.,**

**Defendant.**

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**ORDER AUTHORIZING ADMISSION OF  
PAUL A. CAPUA PRO HAC VICE**

This matter was considered without hearing on the unopposed motion filed by Alon International, S.A. to admit Paul A. Capua *pro hac vice*. The Court has reviewed the motion and finds good cause for the relief sought. Accordingly, it is

**ORDERED and ADJUDGED** that the motion is hereby **GRANTED**. Paul A. Capua may appear before this Court *pro hac vice* as counsel for Defendant, Alon International, S.A., in this action, subject to the rules of this Court.

DONE and ORDERED in the District of Massachusetts on this \_\_\_\_ day of June 2005.

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HONORABLE PATTI B. SARIS  
United States District Judge

Conformed copies sent to:

Jose I. Astigarraga, Esq.  
Richard A. Johnston, Esq  
Michael C. Gilleran, Esq.